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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEDFORD DIVISION

UNITED STATES OF AMERICA

1:18-cr- 00409-MC

v.

INDICTMENT

**ADEBIYI ODUNEYE and OLUWOLE
ODUNOWO,**

**Count 1: 18 U.S.C. § 1349
Conspiracy to Commit Mail Fraud**

Defendants.

**Counts 2 through 4: 18 U.S.C. § 1341
Mail Fraud**

**Counts 5 through 7: 18 U.S.C. § 1341
Mail Fraud**

**Count 8: 18 U.S.C. § 1341
Mail Fraud**

**Counts 9 through 11: 18 U.S.C. § 1028A
Aggravated Identity Theft**

**Counts 12 through 14: 18 U.S.C. § 1028A
Aggravated Identity Theft**

**Count 15: 18 U.S.C. § 1028A
Aggravated Identity Theft**

Forfeiture Allegations:

**18 U.S.C. § 981(a)(1)(C) and 28 U.S.C.
§ 2461(c)**

UNDER SEAL

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THE GRAND JURY CHARGES:

INTRODUCTORY ALLEGATIONS

At all times material to this Indictment:

1. As set forth below, defendants' conduct involved obtaining stolen personal identifying information of more than 43,000 individuals and, beginning at least as early as 2013 and continuing through May 2015, using that information to file fraudulent federal tax returns. In total, defendants and their co-conspirators filed over 1,500 false federal tax returns seeking over 13 million dollars in fraudulent refunds. The actual loss exceeded 4.75 million dollars in refunds.

2. Defendant **ADEBIYI ODUNEYE**, also known by online monikers: "paworkerjob@xxx.com," "adebiyioduneye@xxx.com," "eleda108@xxx.com" and "ijobaowo108@xxx.com;" and, "Yoya" and "Prince Yoya," resides in Nigeria.

3. Defendant **OLUWOLE ODUNOWO**, also known by online monikers: "odunsng@xxx.com" and "oluwaprovider@xxx.com;" and "Wole," resides in Texas.

4. The term "Personal Identifying Information" or "PII," can include an individual's name, address, social security number, date of birth, places of work, duration of work, state driver's license number, mother's maiden name, debit card numbers, bank account numbers, bank routing numbers, e-mail account names, and other account passwords.

5. For tax purposes, an "Electronic Filing PIN" is a five digit or other personal identification number required for electronically filing tax returns with the Internal Revenue Service (IRS) when the filer does not have a Self-Select PIN or know his or her Adjusted Gross Income from the previous year. Using the website IRS.gov, a filer can request an Electronic Filing PIN by authenticating his or her purported identity by entering a host of personal

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information, including social security number, full name, date of birth, filing status, and full address.

6. A “means of identification” is any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including a name, Social Security number, date of birth, or an access device. 18 U.S.C. § 1028(d)(7).

7. An “access device” is, among other things, any card, account number, or other means of account access, that could be used, alone or in conjunction with another access device, to obtain money, goods, services, or any other thing of value, or that could be used to initiate a transfer of funds (other than a transfer originated solely by paper instrument), including a prepaid debit card or prepaid debit card account number. 18 U.S.C. § 1029(e)(1).

8. A “prepaid debit card” is a card linked to an account at a financial institution, which could be used to receive deposits electronically, like a traditional bank account, and to make purchases and cash withdrawals with funds in the account, like a traditional debit card. Prepaid debit cards are administered through many providers including Green Dot Bank.

9. A “disposable email address” is an email address that is given to specified senders and typically used to forward incoming emails to one or more permanent email addresses where the owner receives and reads messages. It may be used as a means of shielding a permanent email address from senders and it can protect the integrity of a permanent email address because the disposable address may be canceled at any time without the owner changing his or her permanent email address. A disposable email address also includes an email address obtained from a service provider without revealing the users true identity and is used for a particular, limited purpose, thereafter to be discarded or not otherwise used for other purposes.

10. The term “IRS transcript” is taxpayer information that shows the taxpayer’s tax return information filed with the IRS including line items from the return filed and basic data, such as marital status, type of return, adjusted gross income and taxable income. It also shows information reported to the IRS such as on W-2, 1099 and 1098 forms. IRS transcripts were available online through the IRS “Get Transcript” application, a multi-step authentication process using the taxpayer’s personal identifying information that is provided such as Social Security number, date of birth, tax filing status and home address as well as answers to personal identity verification questions designed to elicit information that only the taxpayer would normally know, such as the amount of their monthly mortgage or car payment.

COUNT 1
(Conspiracy to Commit Mail Fraud)
(18 U.S.C. § 1349)

11. Paragraphs 1-10 of the Introductory Allegations are incorporated herein.

12. Beginning on a date unknown to the Grand Jury, but no later than 2013 and continuing through May 2015, in the District of Oregon and elsewhere, defendants **ADEBIYI ODUNEYE, OLUWOLE ODUNOWO** and others, known and unknown to the Grand Jury, knowingly and willfully conspired, combined, confederated, and agreed with each other to devise and participate in a material scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and, for the purpose of executing and attempting to execute such scheme and artifice, knowingly used the mails by U.S. Postal Service and private and commercial interstate carriers and caused the mails by U.S. Postal Service and private and commercial interstate carriers to be used in violation of 18 U.S.C. § 1341.

Manner and Means of the Conspiracy and Scheme and Artifice to Defraud

13. It was part of the conspiracy and the scheme to defraud to obtain stolen PII and to use that PII, as well as false information relating to employment and income, for the purpose of claiming fraudulent tax refunds by preparing and electronically filing false and fraudulent tax returns with the IRS. It was part of the conspiracy and scheme to defraud to cause the IRS to issue the fraudulent refunds through prepaid debit cards that had been fraudulently registered with the stolen PII.

Stolen Identity Information

14. It was a further part of the conspiracy and scheme to defraud that defendants and their co-conspirators obtained the names and other PII belonging to United States taxpayers, without their knowledge or consent, by unauthorized means, including the purchase of stolen PII. The stolen PII belonged to over 100,000 people and included PII stolen from a database owned by a pre-employment and volunteer background check company located in Oregon (the "Oregon Database"). Defendant **ODUNEYE** possessed more than 43,000 stolen identities, including over 31,000 from the Oregon Database for purposes of executing the scheme and artifice to defraud. Defendant **ODUNOWO** possessed more than 700 stolen identities including some from the Oregon Database for purposes of executing the scheme and artifice to defraud.

15. It was a further part of the conspiracy and scheme and artifice to defraud that **ODUNEYE, ODUNOWO** and their co-conspirators, using email and instant messenger accounts, exchanged hundreds of communications containing the stolen social security numbers and other PII of United States taxpayers. Some of the specific emails exchanged as part of the conspiracy and scheme and artifice to defraud included the following:

a. On or about September 20, 2013, **ODUNEYE** received an email from a co-conspirator containing stolen PII from the Oregon Database of approximately 2,000 United States taxpayers.

b. On or about February 17, 2015, **ODUNEYE** received an email from a co-conspirator containing stolen PII of approximately 12,000 United States taxpayers.

c. On or about March 22, 2014, **ODUNEYE** emailed stolen PII from the Oregon Database of United States taxpayers to **ODUNOWO**.

d. On or about June 19, 2014, **ODUNEYE** emailed stolen PII of United States taxpayers to **ODUNOWO**.

Electronic Filing PINs

16. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators used the stolen PII to obtain Electronic Filing PINs from the IRS.

17. It was a further part of the conspiracy and scheme and artifice to defraud that the Electronic Filing PINs were acquired in the names of individuals whose PII was stolen for subsequent use in filing fraudulent tax returns in the victim's names.

18. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators, using email and instant messenger accounts, had communications containing the Electronic Filing PINs and stolen taxpayer PII for use in obtaining fraudulent tax refunds. Some of the specific emails/instant messages exchanged as part of the conspiracy and scheme and artifice to defraud included the following:

a. On or about November 3, 2013, **ODUNOWO** sent a co-conspirator an email containing Electronic Filing PINs fraudulently obtained from the IRS for Taxpayer Victim 14 and Taxpayer Victim 15.

b. On or about April 2, 2014, **ODUNEYE** sent a co-conspirator an email containing Electronic Filing PINs fraudulently obtained from the IRS for Taxpayer Victim 10 and Taxpayer Victim 11.

c. On or about April 8, 2014, **ODUNOWO** sent **ODUNEYE** an instant message containing Electronic Filing PINs fraudulently obtained from the IRS for Taxpayer Victim 1 and Taxpayer Victim 2.

Prepaid Debit Cards

19. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators obtained debit and/or other stored value cards for the purpose of receiving direct deposits of fraudulent tax refunds, including Green Dot debit cards issued by Green Dot Bank, a financial institution as defined in 18 U.S.C. § 20.

20. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators purchased Green Dot temporary prepaid debit cards at various retail locations. In order to receive direct deposit funds, including the direct deposit of fraudulently obtained federal tax refunds, the co-conspirators “personalized” the cards by registering them with Green Dot, as required. As part of the registration process, they provided Green Dot with stolen PII, including the names and mailing addresses of those individuals resulting in Green Dot mailing personalized-registered cards via U.S. mail to the mailing addresses and in the registered names provided by the co-conspirators. Upon registration, and in order to receive direct deposits of tax refunds, the co-conspirators also obtained the Green Dot

Bank routing number and the Direct Deposit Account number created from the Primary Card Reference number linked to the number embossed on both the original-temporary card and the personalized-registered card. Some of the specific prepaid debit cards and specific emails exchanged as part of the conspiracy in purchasing debit cards to be used in receiving direct deposits of tax refunds included the following:

a. On or about November 3, 2013, **ODUNOWO** sent a co-conspirator an email containing original-temporary card numbers, bank routing numbers and deposit account numbers fraudulently obtained for Taxpayer Victims 5, 6, 14 and 15.

b. On or about May 25, 2014, ODUNEYE sent a co-conspirator an email containing original-temporary card numbers, bank routing numbers and deposit account numbers fraudulently obtained for Taxpayer Victim 12 and Taxpayer Victim 13.

Disposable Email Addresses

21. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators used disposable email addresses for filing fraudulent tax returns, registering prepaid debit cards in the names of the individuals whose PII was stolen, and to further conceal their fraudulent scheme. As part of the conspiracy, for tax year 2013 disposable email addresses were used to file over 500 fraudulent federal tax returns claiming fraudulent refunds in excess of 5 million dollars.

IRS Transcripts

22. It was part of the conspiracy that the defendants and their co-conspirators used the stolen PII for unauthorized access into the IRS system to obtain taxpayer transcripts for subsequent use in filing fraudulent tax returns in the taxpayers' names.

23. It was a further part of the conspiracy that defendants and their co-conspirators, using email and instant messenger accounts, had communications containing both disposable email addresses that were used in obtaining IRS transcripts and stolen IRS transcript information of individual taxpayers whose information was used in obtaining fraudulent tax returns. Some of the specific emails exchanged as part of the conspiracy included the following:

- a. On February 17, 2015, **ODUNOWO** and **ODUNEYE** discuss getting IRS transcripts and the number of them obtained that week; and,
- b. On March 20, 2015, **ODUNEYE** sent **ODUNOWO** taxpayer PII and IRS transcript information.

Obtaining Fraudulent Refunds

24. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators electronically filed false and fraudulent individual tax returns with the IRS claiming that fraudulent tax refunds were owed.

25. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators used the stolen names and other PII to create the fraudulent income tax returns and false Form W-2 Wage and tax statements that contained fictitious information regarding employment, wages, withholding, and tax credits. Some of the specific emails exchanged as part of the conspiracy and scheme and artifice to defraud to help calculate the required tax withholdings included the following:

- a. On February 17, 2014, **ODUNEYE** and a co-conspirator discussed W-2 information and its use in the calculation of a specific fraudulent tax return; and,

b. On February 20, 2014, **ODUNEYE** and another co-conspirator discussed specific information to use in filing a fraudulent tax return including dependents, occupations, employer and employer identification number and the refund calculation.

26. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators used the Electronic Filing PINs acquired in the names of the individuals who had their PII stolen as well as some of the disposable email addresses to file fraudulent federal tax returns.

27. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators acquired and used hundreds of Green Dot debit cards using the stolen PII to receive fraudulent tax refunds. They included the Direct Deposit Account number along with a Green Dot Bank routing number provided to them at the time of registration on the fraudulently filed tax return to initiate the direct deposit of the fraudulent refunds to the Green Dot Account. They subsequently accessed those funds from the original-temporary card.

28. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators exchanged information regarding the Green Dot account numbers and the anticipated fraudulent tax refunds associated with those accounts. Some of the specific emails exchanged as part of the conspiracy included the following:

a. On November 3, 2013, **ODUNOWO** sent a co-conspirator stolen tax payer PII including Taxpayer Victim 6, Green Dot account numbers associated with those taxpayers, fraudulent tax refund amounts and IRS correspondence when the refund was scheduled for payment; and,

b. On May 6, 2014, **ODUNOWO** sent **ODUNEYE** the last four digits of Green Dot original-temporary card numbers, sign-in identification for those Green Dot accounts and the tax refund amounts for each account.

29. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators passed information in coordination with the acquisition of Green Dot debit cards, the filing of fraudulent tax returns, and attempting to obtain and/or obtaining fraudulent refunds, including the following:

a. On April 8, 2014, **ODUNOWO** emailed the stolen PII and Electronic Filing PIN of Taxpayer Victim 1 and Taxpayer Victim 2 to **ODUNEYE**. On the same day, a conspirator purchased and registered a temporary Green Dot card in the name of Taxpayer Victim 1, whereupon Green Dot mailed the personalized Green Dot card to Taxpayer Victim 1 at an address in Beaverton, Oregon, pursuant to the conspirator's direction. On April 9, 2014, a conspirator filed a fraudulent federal tax return in the names of Taxpayer Victim 1 and Taxpayer Victim 2. The fraudulent return contained accurate stolen PII for both Taxpayer Victim 1 and Taxpayer Victim 2 and claimed a \$9,987 refund for direct deposit into the account associated with the Green Dot card registered in the name of Taxpayer Victim 1.

b. On March 17, 2015, **ODUNEYE** emailed the stolen PII and Electronic Filing PIN of Taxpayer Victim 3 and Taxpayer Victim 4 to **ODUNOWO**. On March 25, 2015, a conspirator, using the same disposable email account associated with the subsequent fraudulent federal tax return filed in the name of Taxpayer Victim 3, purchased and registered a temporary Green Dot card in the name of Taxpayer Victim 3, whereupon Green Dot mailed the personalized Green Dot card to Taxpayer Victim 3 at

an address in Portland, Oregon, pursuant to the conspirator's direction. On March 26, 2015, a conspirator filed a fraudulent federal tax return in the names of Taxpayer Victim 3 and Taxpayer Victim 4. The fraudulent return contained accurate stolen PII for both Taxpayer Victim 3 and Taxpayer Victim 4 and claimed a \$5,792 refund to be directly deposited into the account associated with the Green Dot card registered in the name of Taxpayer Victim 3.

c. On October 11, 2013, **ODUNEYE** emailed the stolen PII and Electronic Filing PIN of Taxpayer Victim 5 and Taxpayer Victim 6 to **ODUNOWO**. On October 14, 2013, a conspirator, using the same disposable email account associated with the subsequent fraudulent federal tax return filed in the name of Taxpayer Victim 5 and Taxpayer 6, purchased and registered a temporary Green Dot card in the name of Taxpayer Victim 7, whereupon Green Dot mailed the personalized Green Dot card to Taxpayer Victim 7 at an address in Monroe, Oregon, pursuant to the conspirator's direction. The fraudulent return contained accurate stolen PII for both Taxpayer Victim 5 and Taxpayer Victim 6 and claimed a \$7,557 refund to be directly deposited into the account associated with the Green Dot card registered in the name of Taxpayer Victim 7. On or about November 3, 2013, **ODUNOWO** emails another co-conspirator the Green Dot account number, the fraudulent tax refund amount and IRS correspondence when the refund was scheduled for payment.

30. It was a further part of the conspiracy and scheme and artifice to defraud that defendants and their co-conspirators retrieved the acquired fraudulent tax refunds from the debit and/or stored value cards through various purchases including wire transfers. This included a

specific exchange on December 15, 2013 where a co-conspirator sent **ODUNEYE** necessary information to complete 29 wire transfers of money from fraudulent tax refunds.

31. Defendants and their co-conspirators took steps to conceal the existence of the conspiracy.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-4
(Mail Fraud)
(18 U.S.C. § 1341)

32. Paragraphs 1-10 of the Introductory Allegations and paragraphs 13-31 of the Manner and Means and Scheme and Artifice to Defraud of Count 1 are incorporated herein.

33. On or about the dates listed below, in the District of Oregon and elsewhere, defendants **ADEBIYI ODUNEYE, OLUWOLE ODUNOWO**, and others, known and unknown to the Grand Jury, for purposes of attempting to execute and executing the aforementioned material scheme and artifice to defraud and to obtain money from the United States Treasury by means of materially false and fraudulent pretenses and representations, knowingly caused the following items to be sent and delivered by the United States Postal Service or private or commercial interstate carrier:

Count	Date	Mailing
2	April 8, 2014	Debit card in the name of Taxpayer Victim 1, addressed to Taxpayer Victim 1 in Beaverton, Oregon.
3	March 25, 2015	Debit card in the name of Taxpayer Victim 3, addressed to Taxpayer Victim 3 in Portland, Oregon.
4	October 14, 2013	Debit card in the name of Taxpayer Victim 7, addressed to Taxpayer Victim 7 in Monroe, Oregon.

All in violation of Title 18, United States Code, Section 1341.

COUNTS 5-7
(Mail Fraud)
(18 U.S.C. § 1341)

34. Paragraphs 1-10 of the Introductory Allegations and paragraphs 13-31 of the Manner and Means and Scheme and Artifice to Defraud of Count 1 are incorporated herein.

35. On or about the dates listed below, in the District of Oregon and elsewhere, defendant **ADEBIYI ODUNEYE** and others, known and unknown to the Grand Jury, for purposes of attempting to execute and executing the aforementioned material scheme and artifice to defraud and to obtain money from the United States Treasury by means of materially false and fraudulent pretenses and representations, knowingly caused the following items to be sent and delivered by the United States Postal Service or private or commercial interstate carrier:

Count	Date	Mailing
5	March 10, 2014	Debit card in the name of Taxpayer Victim 8, addressed to Taxpayer Victim 8 in Corvallis, Oregon.
6	April 6, 2014	Debit card in the name of Taxpayer Victim 10, addressed to Taxpayer Victim 10 in Gresham, Oregon.
7	April 24, 2014	Debit card in the name of Taxpayer Victim 12, addressed to Taxpayer Victim 12 in Canby, Oregon.

All in violation of Title 18, United States Code, Section 1341.

COUNT 8
(Mail Fraud)
(18 U.S.C. § 1341)

36. Paragraphs 1-10 of the Introductory Allegations and paragraphs 13-31 of the Manner and Means and Scheme and Artifice to Defraud of Count 1 are incorporated herein.

37. On or about September 27, 2013, in the District of Oregon and elsewhere, defendant **OLUWOLE ODUNOWO** and others, known and unknown to the Grand Jury, for purposes of attempting to execute and executing the aforementioned material scheme and artifice

to defraud and to obtain money from the United States Treasury by means of materially false and fraudulent pretenses and representations, knowingly caused a debit card in the name of Taxpayer Victim 14 to be sent and delivered by the United States Postal Service or private or commercial interstate carrier to Taxpayer Victim 14 in Dallas, Oregon

All in violation of Title 18, United States Code, Section 1341.

COUNTS 9-11
(Aggravated Identity Theft)
(18 U.S.C. § 1028A)

38. Paragraphs 1-10 of the Introductory Allegations, paragraphs 13-31 of the Manner and Means and Scheme and Artifice to Defraud of Count 1, and paragraph 33 of Counts 2-4 are incorporated herein.

39. On or about the dates and in the manner listed below, in the District of Oregon and elsewhere, defendants **ADEBIYI ODUNEYE, OLUWOLE ODUNOWO**, and others, known and unknown to the Grand Jury, knowingly transferred, possessed, and used, without lawful authority, the means of identification of another person, including names, Social Security numbers, and other stolen PII to obtain prepaid debit cards, during and in relation to the commission of a federal felony enumerated in 18 U.S.C. § 1028A(c), to wit: conspiracy to commit mail fraud and mail fraud in violation of Title 18, United States Code, Sections 1349 and 1341 as alleged in Counts 1-4 of this Indictment, knowing that the means of identification belonged to other actual persons:

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Indictment

Count	Date of Offense	Related Counts	Individual
9	April 8, 2014	1 and 2	Taxpayer Victim 1
10	March 25, 2015	1 and 3	Taxpayer Victim 3
11	October 14, 2013	1 and 4	Taxpayer Victim 7

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5).

COUNTS 12-14
(Aggravated Identity Theft)
(18 U.S.C. § 1028A)

40. Paragraphs 1-10 of the Introductory Allegations, paragraphs 13-31 of the Manner and Means and Scheme and Artifice to Defraud of Count 1, and paragraph 35 of Counts 5-7 are incorporated herein.

41. On or about the dates and in the manner listed below, in the District of Oregon and elsewhere, defendants **ADEBIYI ODUNEYE** and others, known and unknown to the Grand Jury, knowingly transferred, possessed, and used, without lawful authority, the means of identification of another person, including names, Social Security numbers, and other stolen PII to obtain prepaid debit cards, during and in relation to the commission of a federal felony enumerated in 18 U.S.C. § 1028A(c), to wit: conspiracy to commit mail fraud and mail fraud in violation of Title 18, United States Code, Sections 1349 and 1341 as alleged in Counts 1 and 5-7 of this Indictment, knowing that the means of identification belonged to other actual persons:

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Indictment

Count	Date of Offense	Related Counts	Individual
12	March 10, 2014	1 and 5	Taxpayer Victim 8
13	April 6, 2014	1 and 6	Taxpayer Victim 10
14	April 24, 2014	1 and 7	Taxpayer Victim 12

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5).

COUNT 15
(Aggravated Identity Theft)
(18 U.S.C. § 1028A)

42. Paragraphs 1-10 of the Introductory Allegations, paragraphs 13-31 of the Manner and Means and Scheme and Artifice to Defraud of Count 1, and paragraph 37 of Count 8 are incorporated herein.

43. On or about September 27, 2013, in the District of Oregon and elsewhere, defendant **OLUWOLE ODUNOW** and others, known and unknown to the Grand Jury, knowingly transferred, possessed, and used, without lawful authority, the means of identification of Taxpayer Victim 14 including name, Social Security number, and other stolen PII to obtain a prepaid debit card, during and in relation to the commission of a federal felony enumerated in 18 U.S.C. § 1028A(c), to wit: conspiracy to commit mail fraud and mail fraud in violation of Title 18, United States Code, Sections 1349 and 1341 as alleged in and related to Counts 1 and 8 of this Indictment, knowing that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5).

FORFEITURE ALLEGATION

44. Upon conviction of one or more of the offenses set forth in Counts 1 through 15 of this Indictment, defendants **ADEBIYI ODUNEYE** and **OLUWOLE ODUNOWO** shall

forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations.

Dated this 6th day of September 2018.

A TRUE BILL.

Presented by:

BILLY J. WILLIAMS
United States Attorney


BYRON CHATFIELD
Assistant United States Attorney

/s/ Grand Jury Foreperson


GAVIN BRUCE
Assistant United States Attorney